

SHER TREMONTE LLP

June 17, 2021

VIA ECF

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Application granted. The conference is adjourned to October 1, 2021 at 3:30 p.m. Time is excluded until October 1, 2021, under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(A).

Re: *United States v. Yoel Abraham, et al.*,
Case No. 20 Crim. 411 (RA)

Dear Judge Abrams:

SO ORDERED.



Ronnie Abrams, U.S.D.J.
June 18, 2021

We represent Yoel Abraham, a defendant in the above-referenced case. We write on behalf of the parties to request an adjournment of the status conference currently scheduled for June 25, 2021. All defense counsel join in this request and the government consents to the proposed adjournment.

The defendants recently received a discovery production that contains voluminous data from extractions of various digital devices. We are reviewing these materials in addition to analyzing the substantial discovery produced to the government by Amazon. We anticipate making certain additional discovery requests to the government, which will require additional time for the government to disclose and for us to review. Accordingly, we are unlikely to be in a position meaningfully to gauge whether and on what schedule motions would need to be filed in this matter until at least the end of the summer. We therefore request an adjournment of the status conference of approximately ninety days. In light of the Jewish holidays throughout September, we respectfully request that the Court schedule the conference on or after September 30, 2021.

As noted, counsel for all defendants join in this request and the government consents. We consent on behalf of our client to the exclusion of time under the Speedy Trial Act until the next status conference.

Respectfully submitted,

/s/
Justine A. Harris
Noam Biale

Attorneys for Yoel Abraham

cc: All counsel (via ECF)